

**REMARKS**

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1-23, 25-50, 52-78, 80-84 and 88-99 are now present in the application. Claims 94-99 have been added. Claims 94, 96 and 98 are independent. Reconsideration of this application, as amended, is respectfully requested.

**Claim Rejections Under 35 U.S.C. § 103**

Claims 3, 4, 10, 11, 17, 20-22, 30, 31, 37, 38, 44, 47-49, 56, 57, 59, 65, 66, 72, 75-77 83, and 88-90 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick, (U.S. Patent No. 5,710,884; hereinafter as "Dedrick") in view of Mosher et al. (U.S. Patent Application Publication No. US 2003/0050930, hereinafter "Mosher"). Claims 5, 6, 32, 33, 52, 60, 61 and 80 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Nguyen (U.S. Patent No. 5,638,448). Claims 7-9, 34-36 and 62-64 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Kim (U.S. Patent No. 6,546,002 B1). Claims 12-16, 39-43 and 67-71 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Bull et al. (U.S. Patent No. 5,901,287). Claims 18, 45 and 73 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Mohan et al. (U.S. Patent No. 6,505,230 B1). Claims 19, 46 and 74 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Chun et al. (U.S. Patent No. 2002/0184527 A1). Claims 23, 50 and 78 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of

Nagahara et al. (U.S. Patent No. 6,636,246 B1). Claims 26, 53 and 81 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of the article entitled "Net Security Standard from the Open Group Brings the Realization of High-Value E-Commerce for Everyone a Step Further" (hereinafter as "Net Security Standard article"). Claims 27, 54 and 82 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Charisius et al. (U.S. Patent Publication No. 2002/0077842 A1). Claim 84 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Lim et al. (U.S. Patent 6,728,843 B1). Claims 91-93 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Mosher, and further in view of Arlein et al. (U.S. Patent Application Publication No. US 2002/0133500; hereinafter as "Arlain"). These rejections, insofar as they pertain to the presently pending claims, are respectfully traversed.

Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

In light of the foregoing amendments to the claims, Applicants respectfully submit that these rejections have been obviated and/or rendered moot. Without conceding to the propriety of the Examiner's rejection, but merely to timely advance the prosecution of the application, as the Examiner will note, the claims have been amended to present exactly the same claims as filed in the Amendment filed January 5, 2006. In particular, newly added independent claims 94, 96 and 98 are the same as now cancelled independent claims 1, 28 and 55, respectively; newly added dependent claims 95, 97 and 99 are the same as now cancelled dependent claims 3, 29 and 58, respectively.

Independent claim 94 recites a combination of steps including “updating a local repository of the computing device with at least one segment from the central repository that is associated with the user to produce a meta data collection associated with the user”, “utilizing, by the computing device, the meta data collection during a current user session at the computing device to assist the user in using the computing device” and “the utilizing step comprises retrieving, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user”.

Independent claim 96 recites a combination of elements including “computer executable code configured to update a local repository of the computing device with at least one segment from the central repository that is associated with the user to produce a meta data collection associated with the user”, “computer executable code configured to utilize, by the computing device, the meta data collection during a current user session at the computing device to assist the user in using the computing device” and “the computer executable code configured to utilize comprises computer executable code configured to retrieve, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user”.

Independent claim 98 recites a combination of elements including “at least one computing device capable of communicating with the central repository subsystem through a communications network, the computing device comprising a local repository and being capable of connecting, through the communications network, to the central repository based on a user input, updating the local repository with at least one of the segments from the central repository to produce a meta data collection associated with the user, and utilizing the meta data collection

during a current user session at the computing device to assist the user in using the computing device” and “the computing device retrieves, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user”.

Applicants respectfully submit that the above combinations of elements and steps set forth in claims 94, 96 and 98 are not disclosed or suggested by the references relied on by the Examiner.

As mentioned, newly added independent claims 94, 96 and 98 are exactly the same as independent claims 1, 28 and 55 presented in the Amendment of January 5, 2006, respectively. In the Office Action of March 7, 2006, the Examiner had rejected independent claims 1, 28 and 55 under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein.

The Examiner in the Office Action of March 7, 2006 has correctly acknowledged that Dedrick fails to teach retrieving, from the meta data collection (located at the local repository), meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user as recited in claims 1, 28 and 55 (now claims 94, 96 and 98).

Although Arlein discloses the user has the ability to have multiple personae stored in a profile database, Arlein also discloses that it allows the merchant server to read a persona profile of a user from the persona database 208 remote from the user and the merchant (see FIGs. 2 and 4; paragraphs 0075-0079). In other words, the persona profile is obtained by *the merchant server* at the merchant’s site. However, the computer device *of the user* does not obtain the persona profile itself because it is the merchant server, not the computer device of the user, that

uses the persona profile of the user. Therefore, the persona profile cannot be used to “assist the user in using *the computing device*” as recited in claims 94, 96 and 98, and the “meta data” that “would be most appropriate for each of different contexts of *using the computing device*” as recited in claims 94, 96 and 98 cannot be retrieved from the meta data collection (seemed to be referred to by the Examiner as the personal profile) by the computer device of the user, because the persona profile of the user is not at the user’s computer device, but at the merchant’s site.

The Examiner on page 29, lines 15-17 of the Office Action of March 7, 2006 alleged “it is a reasonable expectation that the “multiple personae” found in Arlein could be adapted to exist locally on the client instead of on a remote server since both have storage space.” Applicants respectfully disagree. In particular, one of the major concerns of Arlein is the privacy-preserving global customization to eliminate the privacy risks due to the non-anonymous stored behavioral profiles (see *e.g.*, paragraph 0006). The reason of the persona database 208 remote from the user’s computer or even the persona server is to provide the privacy of the user, *i.e.*, to eliminate any single point at which different personae profiles can be tied to the same user (see Abstract and paragraph 0114). If the “multiple personae” did exist locally on the user instead of on a remote database as the Examiner suggested, the user is exposed to the privacy risk again because different personae profiles of the same user is inevitably tied to the same user due to the locally resided “multiple personae”. Accordingly, Arlein actually teaches away from locating the “multiple personae” locally on the user’s computer device. Therefore, one skilled in the art would not have the motivation to combine Dedrick and Arlein, not to mention the fact that there is no motivation to combine Dedrick and Arlein with the other secondary references.

With regard to the Examiner's reliance on the other secondary references, these references have only been relied on for their teachings of dependent claims. These references also fail to disclose the above combinations of steps and elements as set forth in independent claims 94, 96 and 98. Accordingly, these references fail to cure the deficiencies of Dedrick.

Accordingly, none of the references utilized by the Examiner individually or in combination teach or suggest the above-noted features of independent claims 94, 96 and 98 and their dependent claims (at least due to their dependency). Therefore, Applicants respectfully submit that all of the claims clearly define over the teachings of the utilized references. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103 are respectfully requested.

### **Notice of Appeal & Appeal Brief**

A Notice of Appeal is being filed concurrently herewith. An Appeal Brief will be filed shortly to appeal the Examiner's rejection in the Office Action of March 7, 2006, in so far as it pertains to the present claims.

### **CONCLUSION**

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

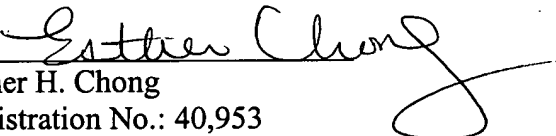
It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 09/0461 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: November 15, 2006

Respectfully submitted,

By   
Esther H. Chong  
Registration No.: 40,953  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatehouse Road  
Suite 100 East  
P.O. Box 747  
Falls Church, Virginia 22040-0747  
(703) 205-8000  
Attorney for Applicant

